

FAX RECEIVED

AUG 24 2001

PETITIONS OFFICE

AFFIDAVIT OF HORST SCHUMACHER

I, Horst Schumacher, state the following:

1. I am a patent attorney at König Palgen Schumacher Kluin, a German law firm.
2. König Palgen Schumacher Kluin has been attempting to locate Gregory Keyes. We have sent correspondence to Mr. Keyes at Meritor Automotive GmbH on December 22, 2000. On March 2, 2001, we were informed by Mrs. Post of Meritor Frankfurt by telephone that Mr. Keyes had moved without leaving a new address or a new telephone number.
3. We attempted to contact Mr. Keyes at his last known telephone number, but the line was no longer in service.
4. We also attempted to locate Mr. Keyes through the British law firm of Marks & Clerk on March 21, 2001. A copy of the correspondence is attached as Exhibit A. Robin J. Oxley of Marks and Clerk responded on March 23, 2001 and stated there was no easy way to obtain the new address of Mr. Keyes as there is no requirement for address registration in Great Britain. A copy of the letter from Marks & Clerk is attached as Exhibit B.
5. By facsimile, we contacted Mrs. Anna Riley, of the Personal Department of Meritor Great Britain on April 9. A copy of the facsimile is attached as Exhibit C. Mrs. Riley responded by email on April 9, 2001 with an address and phone number for Mr. Keyes, a copy attached as Exhibit D. The address provided was Mr. Keyes last known address.
6. To date, we have not been able to locate Mr. Keyes.

August 23, 2001  
Date

Horst Schumacher  
Horst Schumacher

29-AUG-01 15:28 FROM-

T-520 P.002/002 F-895

**AFFIDAVIT OF JOHN JONES**

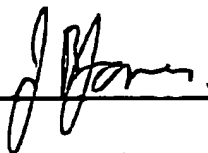
I, John Jones, state the following:

1. I am a patent attorney at Withers & Rogers, a British law firm.
2. Withers & Rogers has been attempting to locate Gregory Keyes. We have sent correspondence to Mr. Keyes at his last known address, 28 Inverclyde Road, Handsworth Wood, Birmingham, West Midlands, B20 2LJ on April 23, 2001. We have had no response from Mr. Keyes regarding this correspondence. A copy of this correspondence is attached as Exhibit E.
3. Withers & Rogers sent a second letter to Mr. Keyes at his last known address on August 22, 2001. A copy of this correspondence is attached as Exhibit F.
4. To date, we have not been able to locate Mr. Keyes.

Date

23 August 2001

John Jones



KÖNIG · PALGEN · SCHUMACHER · KLUIN  
PATENTANWÄLTE

DUSSELDORF · ESSEN

**IN ADVANCE VIA FACSIMILE 0044-020-404-4910**

**MARKS & CLERK**  
Chartered Patent Agents  
57-60 Lincoln's Inn Fields

GB - London WC2A 3LS

Dipl.-Ing. Dr. Reimar König<sup>21</sup>  
Dipl.-Phys. Dr. Peter Palgen<sup>11</sup>  
Dipl.-Phys. Dr. H. Schumacher<sup>29</sup>  
Dipl.-Phys. Dr. Jörg-E. Kluin<sup>11</sup>  
Dipl.-Biol. Gregor S. König<sup>21</sup>

Patentanwälte  
European Patent Attorneys  
European Trademark Attorneys

Essen, March 21, 2001

Our Reference:

Meritor-0 HS/MB

**Information**

Dear Sirs:

We kindly ask you to inform us, if possible by return facsimile, how to find out the new address of a British citizen.

Kind regards

KÖNIG PALGEN SCHUMACHER KLUIN

*MB*

( Dr. Horst Schumacher)

**Exhibit A**

SENDEBERICHT

ZEIT : 21/03/2001 11:16

*Marks & Clerk*  
DATUM/UHRZEIT  
FAX-NR./NAME  
U.-DAUER  
SEITE(N)  
ÜBERTR  
MODUS

*Meritor-0*  
21/03 11:15  
000442074044910  
00:00:20  
01  
OK  
STANDARD  
ECM

**MARKS & CLERK***Intellectual Property*

European Patent Attorneys  
Chartered Patent Attorneys  
European Trade Mark Attorneys  
Registered Trade Mark Attorneys

Established 1887

**London Office**  
57-60 Lincoln's Inn Fields  
London WC2A 3LS

Tel: +44 (0)20 7400 3000  
Fax: +44 (0)20 7404 4910  
Email: [admin@marks-clerk.com](mailto:admin@marks-clerk.com)  
<http://www.marks-clerk.com>

Dr Horst Schumacher  
König Palgen Schumacher Kluin  
Frühlingstrasse 43A  
D-45133 Essen  
GERMANY

**FAX RECEIVED****AUG 24 2001****PETITIONS OFFICE**

please quote  
our reference

**RJO/dm/RJOZ00020**

your reference

**Meritor-0 HS/MB**

date

**23 March 2001**

Document #: 678581

**By Fax (confirm by mail)**  
**00 49 201 84 230 20**

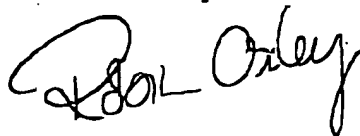
Dear Dr Schumacher

Thank you for your fax dated 21 March 2001.

In response to your query, there is no requirement for address registration as there is in Germany. Therefore, we do not know an easy way of obtaining the new address of a British citizen. It may be possible to check the electoral register, but information on the geographical region of the address is likely to be required to narrow the search. It may also be possible to go to a search agency, or investigation agency, who have more expertise in this field of searching.

I am sorry that we have not been able to help you more in your enquiry, and wish you luck in finding this information.

Yours sincerely



Robin J Oxley  
MARKS & CLERK

**EX-101-B**

Partners  
E W B Lyndhurst-Stanford M A C A  
W D McCulloch M A C A  
A W Fiddes M A C A  
C J R Gordon M A C A  
A R Pearce M A C A  
D Carpenter M A C A  
J Davenport M A C A  
M R Parnham M A C A  
R Worsley M A C A  
P J Abbott M A C A  
M P Higgins M A C A  
D G Tibby M A C A  
F J Blaxter M A C A

J A Dwyer M A C A  
A H W Luchford M A C A  
S P Macdonald M A C A  
R P Macdonald M A C A  
S J Macdonald M A C A  
C T Macdonald M A C A  
D O Macdonald M A C A  
H D Lord M A C A  
R P Macdonald M A C A  
B J Macdonald M A C A  
K L Macdonald M A C A  
E D M Macdonald M A C A  
S G Macdonald M A C A  
E J Macdonald M A C A

T S Anderson M A C A  
J F Asquith M A C A  
J Kay M A C A  
J L Lister M A C A  
R L Lister M A C A  
P J Macdonald M A C A  
S M Macdonald M A C A  
R M Macdonald M A C A  
R M Macdonald M A C A  
J D Macdonald M A C A  
J D Macdonald M A C A

Associates  
E C Macdonald M A C A

R Lind M A C A  
A C Macdonald M A C A  
J L Macdonald M A C A  
R J Macdonald M A C A  
P Roberts M A C A  
A Stark M A C A  
J S Macdonald M A C A  
R D Macdonald M A C A  
P C Macdonald M A C A  
D J Macdonald M A C A  
C L Macdonald M A C A  
D R Macdonald M A C A

KÖNIG · PALGEN · SCHUMACHER · KLUIN  
P A T E N T A N W Ä L T E

DÜSSELDORF · ESSEN

**ONLY VIA FACSIMILE 0044-121-606 04 98**

Meritor Birmingham  
attn. Mrs. Anna Riley  
(Personal Department)

Dipl.-Ing. Dr. Reimar König<sup>21</sup>  
Dipl.-Phys. Dr. Peter Palgen<sup>11</sup>  
Dipl.-Phys. Dr. H. Schumacher<sup>23</sup>  
Dipl.-Phys. Dr. Jörg-E. Kluin<sup>11</sup>  
Dipl.-Biol. Gregor S. König<sup>23</sup>

Patentanwälte  
European Patent Attorneys  
European Trademark Attorneys

Essen, April 9, 2001

FAX RECEIVED

AUG 24 2001

PETITIONS OFFICE

Our Reference:

100 375, 100 377 HS/MB

Address of Mr. Keyes

Dear Mrs. Riley:

I refer to our telephone conversation from today. Please note our following e-mail address:

E@KPSK.DE

We now kindly ask you to send us the full address as well as the telephone number of Mr. Gregory Keyes.

We like to thank you for your kind assistance in this matter.

Kind regards,

KÖNIG PALGEN SCHUMACHER KLUIN

*M. Büttgenbach*

(i. A. Marita Büttgenbach)

SENDEBERICHT

ZEIT : 09/04/2001 08:26

DATUM/UHRZEIT  
FAX-NR./NAME  
U.-DAUER  
SEITE(N)  
ÜBERTR  
MODUS

09/04 08:25  
00103300441216060498  
00:00:19  
01  
OK  
STANDARD  
ECM

EXCIBIT C

MAKRO CLERKS

Seite 1 von 1

Von: Anna M Riley/Euro/Auto <rileyam@meritorauto.com>  
An: e@kpsk.de <e@kpsk.de>  
Datum: Montag, 9. April 2001 08:48  
Betreff: Grag Keyes

FAX RECEIVED

AUG 24 2001

PETITIONS OFFICE

Marita

Good Morning

Further to our telephone conversation today, please find the address and telephone number for Greg Keyes.

28 Inverclyde Road  
Handsworth Wood  
Birmingham  
B20 2LJ  
England

*← Walt Adams*

Tel: 0121-686 6340

*... hier Anschluss an die Adresse von Ch*

Good Luck !!

*03. April 2001*

Kind Regards

*17.12*

Anna

D-t-B-5XII

**CARLSON, GASKEY & OLDS**

A PROFESSIONAL CORPORATION

Karin H. Butchko  
John E. Carlson  
Anthony P. Cho  
David J. Gaskey

400 WEST MAPLE ROAD  
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BIRMINGHAM, MI 48009

Telephone 248.988.8360  
Facsimile 248.988.8363

William S. Gottschalk  
Kerrie A. Laba  
Theodore W. Olds, III  
David L. Wisz

April 12, 2001

Direct Dial No. (248) 988-8688

Email: [Kbutchko@CarlsonGaskeyOlds.com](mailto:Kbutchko@CarlsonGaskeyOlds.com)

Mr. Gregory Keyes  
28 Inverclyde Road  
Handsworth Wood  
Birmingham, West Midlands  
B20 2LJ, United Kingdom

VIA FEDERAL EXPRESS

Re: U.S. Patent Application for "MOTOR VEHICLE DOOR"  
Serial No. 09/672,393 filed on September 28, 2000  
Our File No. 60,130-899; Meritor File No. 00MRA0028

U.S. Patent Application "VEHICLE DOOR"  
Serial No. 09/672,468 filed on September 28, 2000  
Our File No. 60,130-900; Meritor File No. 00MRA0030

FAX RECEIVED

AUG 24 2001

PETITIONS OFFICE

Dear Mr. Keyes:

I have enclosed copies of the above-identified patent applications as filed with the United States Patent and Trademark Office.

Also enclosed is a Declaration and Assignment for your execution. Please sign and date the Declaration and Assignment and return these papers to our office as soon as possible for filing with the United States Patent and Trademark Office. If any changes are made to the Assignment or Declaration, please be sure to initial your handwritten changes.

I look forward to hearing from you. In the meantime, should you have any questions, please do not hesitate to contact me.

Very truly yours,

CARLSON, GASKEY &amp; OLDS



Karin H. Butchko

KHB/rb  
Enclosures

cc: Scott M. Confer, Esq. (w/o encls)  
Theodore W. Olds, Esq. (w/o encls)

EX-101-G

**WITHERS & ROGERS**  
 EUROPEAN & CHARTERED PATENT ATTORNEYS  
 TRADE MARK ATTORNEYS

75 Colmore Row, Birmingham B3 2AP  
 Tel: +44 (0)121 245 3900 Fax: +44 (0)121 245 3930  
 E-Mail: [admin@withersrogers.com](mailto:admin@withersrogers.com) Web: [www.withersrogers.com](http://www.withersrogers.com)

Mr Gregory Keyes  
 28 Inverclyde Road  
 Handsworth Wood  
 Birmingham  
 West Midlands  
 B20 2LJ

Our Ref: P300073US/BJJ  
 Your Ref:

23 April 2001

**FAX RECEIVED**

**AUG 24 2001**

**PETITIONS OFFICE**

Dear Mr Keyes

**New US Patent Application Covering Multiple Fixings**

Firstly by way of introduction, we are the firm of Patent Agents that act for Meritor Light Vehicle Systems (UK) Limited.

You may recall that you attended an invention workshop on 4th May 1999 wherein you and others invented this invention (copy of application enclosed).

I now require to carry out certain formalities before the US Patent Office and, in view of your employment by Meritor Light Vehicle Systems (UK) Limited at the time the invention was made, I would be grateful if you could sign and date the enclosed Declaration against your name and also sign and date the enclosed Assignment against your name and return the duly executed documents to me. In this regard I enclose a stamped self addressed envelope.

Thank you in advance.

Yours sincerely



**John B Jones**  
**WITHERS & ROGERS**

Encs - Copy of Application  
 Declaration  
 Assignment  
 Stamped self addressed envelope

Ref 8120011

Partners: David Bannerman, Nicholas Wilson, Michael Blatchford, Adrian Chettle, Jeff Hogg, John Dean, Ben Dempster, Karl Darnfather, Simon Deck, Ivor Harrison, David Prou, Mark Armitage\*, Colin Jones, Howard Wright, David Croston, Nigel Parnell\*, Andrew Murch\*, John Jones

Consultant Partner: Peter Turner

\* *MITMA*. All other partners C.P.A. & F.P.A.

Associates: Christopher Iley, David Elsy, Adrian Tombling, James Gray, Joeeta Murphy, David Fry, Alex Duffield, Paul Derry, Matthew Allen, Keith Tan, Laurel McBray, Jackie Tolson, Robert Sayer, Consultants: Michael Adkins, David Cowan

Practice Manager: Richard Clark, Accounts: Mary Sturgess, Renewals: David Ayres (Manager), Mary Downey  
 Translations: Rosemary Booth, Searching: Robin Webster, EP Formalities: Karen Austen

**EXC-10-11**



22-AUG-01 13:07 FROM-

T-508 P.002/002 E-787

**WITHERS & ROGERS****EUROPEAN & CHARTERED PATENT ATTORNEYS  
TRADE MARK ATTORNEYS**

75 Colmore Row, Birmingham BAP

Tel: +44 (0)121 245 3900 Fax: +44 (0)121 2 1930

E-Mail: admin@witherersrogers.com Web: www.witherstop.com

Mr Gregory Keyes  
28 Inverclyde Road  
Handsworth Wood  
Birmingham  
West Midlands  
B20 2LJ

Our Ref: P300073US/JBJ

Your Ref:

22 August 2001

BY POST ONLY

FAX RECEIVED

AUG 24 2001

Dear Mr Keyes

PETITIONS OFFICE

**New US Patent Application Covering Multiple Fixings**

Further to my letter of 23 April 2001, I write to remind you that we have yet to receive a completed Declaration and Assignment from you in relation to this invention. I enclose further copies of these for your convenience.

As I mentioned in my previous letter, the documents are required to carry out certain formalities before the US Patent Office and, in view of your employment by Meritor Light Vehicle Systems (UK) Limited at the time the invention was made, I would be grateful if you could sign and date the enclosed Declaration against your name and also sign and date the enclosed Assignment against your name and return the duly executed documents to me. In this regard I enclose a further stamped self-addressed envelope.

If we do not receive a response from you within one month of the date of this letter we shall assume that you refuse to sign the document and we shall continue the application process without your signature.

Thank you in advance.

Yours sincerely,

*John B Jones*  
**John B Jones**  
**WITHERS & ROGERS**

Enc Copy of Application  
Declaration  
Assignment  
Stamped self-addressed envelope

24 8(2001)

Partners: David Bannerman, Nicholas Wilson, Michael Blatchford, Adrian Cheate, Jeff Hogg, John Dean, Ben Dempster, Karl Burnfather, Simon Ivor Harrison, David Pratt, Mark Armbruster, Colin Jones, Howard Wright, David Cusston, Nigel Farnell\*, Andrew Murch\*, John Jones

Consultant Partner: Peter Turner

\* MITRA. All other partners C.P.A. &amp; E.P.A.

Associates: Christopher Hey, David Elsy, Adrian Tombling, James Gray, Joseph Murphy, David Fry, Alex Duffield, Paul Derry, Matthew Allen, Keith Turt, Laurel McBray, Jackie Tolson, Robert Sayer, Consultants: Michael Adkins, David Cowan

Practice Manager: Richard Clark, Accounts: Mary Burgess, Renewals: David Ayres (Manager), Mary Downey  
Translations: Rosemary Booth, Searching: Robin Webster, EP Formalities: Karen Austin

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60 Holly Walk, Leamington Spa, Warwickshire CV32 4JE Tel: +44 (0)1926 336111 Fax: +44 (0)1926 335519 and  
1 Redcliff Street, Bristol BS1 6NP Tel: +44 (0)117 925 3030 Fax: +44 (0)117 925 3530

**EXC-101**